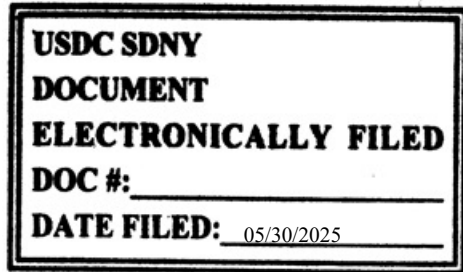




THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, N.Y. 10007

EDWARD REILINGH
Assistant Corporation Counsel
Tel.: (212) 356-3521
Fax: (212) 356-3509
ereiling@law.nyc.gov



May 23, 2025

VIA ECF

Honorable Katharine H. Parker
United States Magistrate Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

APPLICATION GRANTED

 05/30/2025
Hon. Katharine H. Parker, U.S.M.J.

Re: Jah'rel M. Terez v. Manolis Kambouris, et al.,
22 Civ. 02834 (JGK)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney representing defendants the City of New York and Manolis Kambouris (“defendants”) in the above-referenced matter. Defendants write to respectfully request an extension of time of the parties’ deadline: (1) to file a request for a pre-motion conference, from May 30, 2025 to July 30, 2025, which is one week after the July 23, 2025 settlement conference; (2) to serve and file dispositive motions, from June 13, 2025 to August 13, 2025; and (3) a corresponding extension of time for the parties to file a Joint Pre-Trial Order and motions in limine. This is the first request of this kind and *pro se* plaintiff Jah’re Terez consents to this request.

On April 15, 2025, the Court extended the time for the parties to complete discovery to May 16, 2025, set the deadline to file a request for a pre-motion conference for a motion for summary judgement to May 30, 2025, for any dispositive motions to be filed by June 13, 2025, and for the Joint Pre-Trial Order and motions in limine to be filed by July 3, 2025, or twenty-one (21) days after decision of any dispositive motion. See ECF No. 76. Following a pre-settlement telephone conference before Your Honor on April 21, 2025, a settlement conference was scheduled to be held on May 12, 2025. See ECF No. 77. On May 1, 2025, this matter was referred to Your Honor for General Pretrial purposes. See ECF No. 80. On May 6, 2025, David Michael White, Esq. entered his appearance as *pro bono* counsel in this case on behalf of plaintiff for the limited purpose of the settlement conference, Mr. White requested additional time to prepare for the

settlement conference, and the settlement conference was re-scheduled to July 23, 2025. See ECF No. 85, 86.

In light of the foregoing and the adjournment of the settlement conference in this matter, defendants respectfully request an extension of time of the parties' deadline to file a request for a pre-motion conference, from May 30, 2025 to July 30, 2025 and for corresponding extensions of time for dispositive motion practice, filing of the Joint Pre-Trial Order and motions in limine until after the parties have an opportunity to engage in the settlement conference.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Edward Reilingh

Edward Reilingh

Assistant Corporation Counsel

Special Federal Litigation Division

cc: **VIA FIRST-CLASS MAIL**
Jah'rel M. Terez
Plaintiff pro se
1881 Sedgwick Avenue, Apt. 1B
Bronx, New York 10453